

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

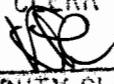
UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

2020 MAY 21 PM 3:38

UNITED STATES OF AMERICA

v.

Criminal No.

BY   
DEPUTY CLERK

EIKE BLOHM,  
Defendant.

2:20-mj-64-1

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Seth M. Fiore, being duly sworn, depose and state as follows:

**BACKGROUND OF AFFIANT**

1. I am a Special Agent with Homeland Security Investigations (“HSI”), and I have been employed by HSI as a Special Agent since October of 2009. I am presently assigned to the HSI office in Burlington, Vermont. I have received extensive training provided by the Federal Law Enforcement Training Center and HSI in the investigation and enforcement of laws of the United States. I have received training specifically in the area of child pornography (as defined in 18 U.S.C. § 2256) and child exploitation. I have, as part of my daily duties as an HSI Special Agent, investigated violations relating to child exploitation and child pornography, including violations pertaining to the possession, distribution, receipt and production of child pornography, the online enticement of minors, and traveling in interstate and foreign commerce to engage in sexual activity with minors, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, 2422, and 2423. I have participated in the execution of numerous search and arrest warrants involving child exploitation and/or child pornography offenses.

2. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code (“U.S.C.”), that is, an officer of the

United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. This affidavit is being submitted in support of a Criminal Complaint for Eike BLOHM (“BLOHM”) for violations of 18 U.S.C. § 2251(a)(1) - Production of Child Pornography, and 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography (collectively the “TARGET OFFENSES”).

4. The statements contained in this affidavit are based in part on information provided by members of local, state, and federal law enforcement, my own investigation to include personal observations, documents, and other investigative materials that I have reviewed, as well as my training and experience as a Special Agent with HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that BLOHM has committed the TARGET OFFENSES.

#### **STATUTORY AUTHORITY**

5. This investigation concerns alleged violations of the following statutes:

a. Title 18, United States Code, Section 2251(a) prohibits “[a]ny person who employs, uses, persuades, induces, entices, or coerces any minor to engage in . . . any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished . . . if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.”

b. Title 18, United States Code, Section 2252(a)(4)(B) prohibits a person who “knowingly possesses . . . any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting

interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.”

**PROBABLE CAUSE**

6. On April 16, 2020, the Burlington, Vermont Police Department (“BPD”) received a report from University of Vermont Medical Center (“UVMMC”) security that a video camera had been found concealed in an air freshener in an employee bathroom in the Emergency Department of UVMMC, located at 111 Colchester Ave., Burlington, Vermont. BPD took possession of the video camera (“camera”) and the MicroSD Card (“MicroSD Card”) that was contained inside it.

7. On April 16, 2020, BPD Detective Eric Dalla Mura, who is assigned to the Chittenden Unit for Special Investigations (“CUSI”), forensically processed the MicroSD Card. He used a Tableau Forensic USB 3.0 Bridge and Magnet Axiom machine and identified it as a green Samsung Evo Select 128 GB MicroSD Card. Det. Dalla Mura discovered that the MicroSD Card contained approximately 14GB of data. A summary of the used storage space showed over 1,300 videos in the common “mp4” video file format.

8. Det. Dalla Mura reviewed some of the contents of the MicroSD Card and observed what appeared to be a male setting up the camera in what appeared by physical characteristics to be the same location where the camera was discovered at UVMMC. Det. Dalla Mura viewed several videos depicting the same male setting up the camera multiple times in multiple locations. In several of these videos, Det. Dalla Mura observed that the male was wearing a badge that read, “Physician.” In other videos on the MicroSD Card, this male can be seen wearing a badge that reads, “Eike Blohm, MD,” “Emergency Medicine,” and “Physician.” Det. Dalla Mura compared this data to the UVMMC staff directory, which includes headshots of the staff members. Det.

Dalla Mura observed that an emergency medicine physician at UVMMC named Eike BLOHM, MD, appeared to be the same person who is depicted setting up the camera multiple times in multiple videos on the MicroSD Card.

9. While reviewing the contents of the MicroSD Card, Det. Dalla Mura observed that the camera had been moved on multiple dates to new locations. According to the camera's time stamps, for example, the camera had been located in the bathroom at UVMMC where it was discovered from approximately April 13, 2020, to April 14, 2020. Over 300 videos were recorded during this time period. During that time, the camera primarily captured short videos of male and female staff members changing clothes or using the toilet. These individuals appear to be unaware that they are being recorded. These videos occasionally captured the genitalia of the person depicted in the video.

10. While reviewing the contents of the MicroSD Card, Det. Dalla Mura also observed that the camera had apparently been placed at a different location on an earlier date. According to the camera's time stamps, from March 24, 2020, through April 9, 2020, the camera had been placed in what appeared by physical characteristics to be a different bathroom at UVMMC. The camera captured individuals wearing scrubs and nametags. Det. Dalla Mura observed that over 600 videos were recorded while the camera was at that location. The individuals in these videos also appear unaware that they are being recorded as they use the toilet, change clothes, and occasionally inadvertently exposed their genitalia to the camera.

11. While reviewing the contents of the MicroSD Card, Det. Dalla Mura also observed that the camera had apparently been placed in a different location on an earlier date. According to the camera's time stamps, from approximately December 12, 2019, through March 17, 2020, the camera had been placed in what appeared by physical characteristics to be a private bathroom

containing a shower, bath, and a mirror. Det. Dalla Mura observed that approximately 250 videos were made during that time period. Det. Dalla Mura observed that these videos depicted at least two (2) women repeatedly showering, bathing, and/or standing at the mirror, seemingly unaware that they were being filmed and captured nude on video.

12. Based on the foregoing, on April 17, 2020, a State of Vermont, Chittenden County, judicial officer issued warrants to search BLOHM'S office at UVMMC, BLOHM's vehicle, and BLOHM's residence, located at 203 Meadowood Dr. in South Burlington, Vermont, for evidence of violations of voyeurism, Vermont Title 13, Section 2606. Law enforcement executed the search warrant that day and seized multiple electronic media storage devices and cameras. BLOHM was cited with multiple counts of Voyeurism on that date.

13. On April 17, 2020, the Vermont Department of Children and Families ("DCF") received an intake report from a mental health professional who is a mandated reporter of suspected child abuse and neglect. The report detailed a conversation between this mental health professional and BLOHM, reported the following:

Reporter states he met with Stepdad/Eike today. Eike disclosed that 7 months ago he placed a hidden camera in his master bathroom to record his wife in the shower. Eike disclosed that he was intentionally recording Mom . . . while showering with a motion activated camera in order to masturbate to it later. [REDACTED]

[REDACTED]

[REDACTED]

14. While law enforcement officers executed the search warrant at BLOHM's home on April 17, 2020, the officers identified six (6) individuals who were residing there, four adults and two minors: BLOHM; BLOHM's fiancée, Staci Tokarz; Staci's mother, Donna Kinney; Staci's sister, Stephanie Tokarz; and two minor females [REDACTED] and [REDACTED]

15. On April 28, 2020, Det. Dalla Mura and a DCF investigator interviewed Staci

Tokarz, [REDACTED] and [REDACTED] Staci Tokarz was able to describe her and Stephanie Tokarz's tattoos, which allowed Det. Dalla Mura to confirm that both sisters were depicted in video recordings found on the MicroSD Card.

16. Det. Dalla Mura prepared face-only images from videos found on the MicroSD Card that he believed depicted the [REDACTED] minor, [REDACTED]. The images were cut from a series of videos that Det. Dalla Mura believed depicted a completely nude child the bathtub whose genitalia were captured in the videos. Det. Dalla Mura confirmed that the bathroom depicted in these videos appeared by physical characteristics to be [REDACTED]  
[REDACTED]  
[REDACTED]

17. On April 21, 2020, a State of Vermont, Chittenden County, judicial officer issued a search warrant for evidence of Voyeurism, Vermont Title 13, Section 2606, for the electronic items seized on April 17, 2020, during the execution of the search warrant of BLOHM's home. A subsequent warrant was issued on April 24, 2020, which extended the time period within which the forensic examination of the seized devices needed to be completed. The evidence was transferred from CUSI to the Vermont State Police ("VSP") Technology Investigation Unit ("TIU") on April 30, 2020.

18. On May 6, 2020, after Det. Dalla Mura learned that the evidence seized to date likely contained videos of a known minor displaying her genitalia, he sought and obtained a State of Vermont, Chittenden County, search warrant for evidence of violations of Voyeurism, Vermont Title 13, Section 2606; Vermont Title 13, Possession of Child Pornography and Promoting a Recording of Sexual Conduct, Sections 2827 and 2824; and Title 18 U.S.C. § 2256 – Possession of Child Pornography, for the electronic items seized on April 17, 2020, during the

execution of the search warrant of BLOHM's home.

19. On May 18, 2020, Det. Dalla Mura provided me with a copy of the media from the MicroSD Card, and reported that approximately 21 videos that depicted [REDACTED] nude were found. According to Det. Dalla Mura, the videos are all approximately 151 seconds in length and show [REDACTED]

[REDACTED] The three (3) I reviewed showed the following:

a. M20200317130137.mp4 – The video is 00:02:31 in length and shows a nude minor female getting into a bathtub filling with water. The nude female moves about in the water, occasionally hugging herself as if cold, and her developing breasts are periodically exposed.

b. M20200317130415.mp4 – The video is 00:02:31 in length and shows the same nude minor female in a bathtub full of water, moving around, and periodically exposing her developing breasts and genitals.

c. M20200317131016.mp4 – The video is 00:02:31 in length and shows the same nude female moving about in a bathtub filled with water, exposing her developing breasts and genitals.

20. On May 15, 2020, VSP Detective Sergeant Eric Jollymore, assigned to the VSP TIU, provided me with a copy of images he obtained while forensically reviewing an Apple iPad seized from BLOHM by law enforcement officers during the April 17, 2020, execution of the search warrant for his home. Det. Sgt. Jollymore identified approximately 132 unique images of child exploitation material ("CEM") on this device. I reviewed two (2) of the images, and they are:

a. 202229-0 00008027-

001510261E31002E\_files\_full.zip\private\var\mobile\Containers\Shared\AppGroup\89C1569F-07D3-4502-8B35-

77BC16D3833D\Library\Caches\WebImageCache\480h\5zvzsuj3cbjkrmln2etm3enc.JPG – This image depicts a completely nude prepubescent female laying on a blanket or towel over sand, similar to a beach or lakefront, with her underdeveloped breasts and legs open, revealing her genitalia. The prepubescent female is looking at the camera and her elbows are supporting her neck and shoulders in order for her to do so from the blanket or towel.

b. 203277-0 00008027-

001510261E31002E\_files\_full.zip\private\var\mobile\Containers\Shared\AppGroup\89C1569F-07D3-4502-8B35-

77BC16D3833D\Library\Caches\WebImageCache\720h\giojm6ykpavdi5ppbh2zt3bq.JPG – This image depicts a completely nude prepubescent boy standing with an erection and receiving oral sex from a petite, nude minor girl while another young, nude minor girl with developing breasts holds the petite girl's head.

21. Based on my training and experience, I know Apple iPad are made and manufactured outside the State of Vermont.

22. Based on my training and experience, I know that the Internet is a means or facility of interstate or foreign commerce and that Samsung MicroSD Cards are made and manufactured outside the State of Vermont.

### **CONCLUSION**

23. Based on my training and experience and the facts set forth in this Affidavit, I believe that there is probable cause to believe that violations of 18 U.S.C. § 2251(a)(1) - Production of Child Pornography, and 18 U.S.C. § 2252(a)(4)(B) – Possession of Child

Pornography have been committed by BLOHM.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Special Agent Seth M. Fiore  
Department of Homeland Security  
Homeland Security Investigations

Subscribed and sworn to before me this 21<sup>st</sup> day of May 2020.

  
HON. JOHN M. CONROY  
UNITED STATES MAGISTRATE JUDGE